# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

**GRADUAL TAYLOR** Case No. 1:02cv446 :

> Plaintiff, (Judge Weber) :

v. JOINT MOTION TO EXTEND

DISCOVERY DEADLINE AND PO CHERYL HART, et al. :

**MODIFY SCHEDULE** 

Defendants.

The parties jointly move the Court to vacate the existing scheduling order and to schedule the discovery deadline for March 30, 2007, and filing the dispositive motions for May 31, 2007, and trial at the court's convenience. The reason for the Motion is that the Plaintiff and his wife have business commitments that prevent them and the Defendants from completing discovery.

For the foregoing reasons, the Joint Motion to Extend Discovery Deadline and Modify Schedule should be granted.

Respectfully submitted,

JULIA L. McNEIL (0043535) **City Solicitor** 

## /s/ Richard Ganulin

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## **CERTIFICATE OF SERVICE**

I hereby certify on December 12, 2006 a true and accurate copy of the foregoing Joint Motion to Extend Discovery Deadline and Modify Schedule was electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and copies will be mailed to those parties by certified mailed who are not served via the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Richard Ganulin

Richard Ganulin (0025642C) Assistant City Solicitor